

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 21-CR-108 (2) (PAM/TNL)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
vs.)	DEFENDANT THAO’S PROPOSED
)	VOIR DIRE QUESTIONS
)	
TOU THAO,)	
)	
Defendant.)	
)	

Mr. Tou Thao, by and through his counsel Robert M. Paule and Natalie R. Paule, respectfully requests, pursuant to Federal R. Crim. Pro. 24(a)(2)(B), that the following questions be asked of the jurors.

The proposed questions address the potential changing/shifting opinions or knowledge jurors may have experienced from the time they filled out the questionnaire to the beginning of voir dire, or due to developments in the case the media has reported on.

1. As stated in the questionnaire, this case involves the death of George Floyd on May 25, 2020. The three defendants on trial before you are: Tou Thao, J. Alexander Kueng, and Thomas Kiernan Lane. Although the case is titled *United States v. Chauvin et. al*, former Minneapolis Police Officer Derek Chauvin is not on trial here. Would you please raise you hand if you have

seen, read, or heard anything relating to the events, the people involved, or about the case generally since filling out the jury questionnaire.

- a. What did you see, hear, or learn after you filled out the questionnaire?
 - b. Does any of what you since learned give you new or different opinions or thoughts on the case or the people involved. If so, will you please explain.
2. Do you recognize any of the attorneys, defendants, prospective witnesses, or anyone else in the courtroom?
3. The following proposed question would be asked only to those who did not put down an affirmative “yes” for question sixty-four (64) of the juror questionnaire:
 - a. In the juror questionnaire, you were asked if you can decide this case based only upon the evidence presented before you in this Court and no outside information, bias, or knowledge. You were asked if you can remain impartial. Will you please explain your thoughts to this question? After thinking about it, do you know for certain that you can remain impartial and only decide the case upon the evidence and laws presented to you in this Court?

Respectfully submitted,

Dated: This 6th day of January, 2022

/s/ Robert M. Paule
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